



FEB 11 2015

Mr. Neil McDougald
E&J Gallo Winery
5610 E. Olive Avenue
Fresno, CA 93727

**Re: Notice of Minor Title V Permit Modification
District Facility # C-447
Project # 1142329**

Dear Mr. McDougald:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-447-226-11 (under project C-1141462) into the Title V operating permit. This ATC authorized the modification of one 175,320 gallon winery wastewater anaerobic reactor to allow for biogas to be vented and combusted in the boiler operating under permit C-447-329.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-447-226-11, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Sayed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: 1142329

Engineer: Dustin Brown
Date: February 11, 2015

Facility Number: C-447
Facility Name: E & J Gallo Winery
Mailing Address: 5610 E. Olive Avenue
Fresno, CA 93727

Contact Name: Neil McDougald
Phone: (559) 458-2584

Responsible Official: Neil McDougald
Title: Plant Manager

I. PROPOSAL

E & J Gallo Winery is proposing a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-447-226-11 into their Title V operating permit. This ATC authorized the modification of one 175,320 gallon winery wastewater anaerobic reactor to allow for biogas to be burned in the boiler operating under permit C-447-329.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

E & J Gallo Winery is located at 5610 E. Olive Avenue in Fresno, CA.

III. EQUIPMENT DESCRIPTION

Current Permit Equipment Description:

C-447-226-10: 175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2, -3, OR -295, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK

ATC Equipment Description:

C-447-226-11: MODIFICATION OF 175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2, -3, OR -295, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK: ALLOW BIOGAS TO BE SENT TO THE BOILER LISTED IN PERMIT C-447-329

Post Project Equipment Description:

C-447-226-12: 175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, '2, '3, '295, OR '329, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

E & J Gallo Winery is proposing to modify one 175,320 gallon winery wastewater anaerobic reactor to allow for biogas to be burned in the boiler operating under permit C-447-329. The boiler operating under permit C-447-329 is already authorized to combust biogas, therefore, no additional changes to the boiler permit are required at this time. There will be no other changes to the methods of operation of this equipment or the facility operations as a part of this project.

There are no emission increases from the facility associated with the proposed change(s) to this anaerobic reactor.

Existing PTO Changes:

Existing PTO condition 8 was revised in accordance with the Flare Minimization Plan requirements of Rule 4311, Section 5.8. The revised requirement has been included as condition 11 of this revised permit.

Existing PTO condition 11 was revised in accordance with the flare operating requirements of Rule 4311, Section 5.4. The revised requirement has been included as condition 10 of this revised permit.

Existing PTO condition 15 was revised in accordance with the source test result submittal requirements of Rule 4311, Section 6.4.2. The revised requirement has been included as condition 16 of this revised permit.

Existing PTO condition 23 was revised in accordance with the recordkeeping requirements of Rule 4311, Section 6.1. The revised requirement has been included as condition 29 of this revised permit.

New PTO Conditions:

Condition 12 of the requirements for this revised permit was added to assure compliance with the flare operational requirements of Rule 4311, Section 5.10.

Conditions 24 through 26 of the requirements for this revised permit were added to assure ongoing compliance with the flare reporting requirements of Rule 4311, Section 6.2.

Conditions 27 and 28 of the requirements for this revised permit were added to assure ongoing compliance with the flare minimization plan requirements of Rule 4311 Section 6.5.

ATC Condition Changes:

ATC condition 1 has been removed and not included in the requirements for this revised permit as E&J Gallo Winery has submitted the appropriate Title V minor modification application to incorporate this ATC in to their Title V operating permit.

ATC condition 2 has been removed and not included in the requirements for this revised permit as ATC C-447-226-10 has already been converted and incorporated in to E&J Gallo's Title V operating permit (reference project C-1132501).

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit C-447-226-12
- B. Authority to Construct C-447-226-11
- C. Application
- D. Previous Title V Operating Permit C-447-226-10

ATTACHMENT A

Proposed Modified Title V Operating Permit
C-447-226-12

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-447-226-12

EXPIRATION DATE: 06/30/2016

EQUIPMENT DESCRIPTION:

175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, '2, '3, '295, OR '329, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK

PERMIT UNIT REQUIREMENTS

1. The primary chamber of the anaerobic reactor shall be enclosed and vented to the biofilter listed on C-447-225. [District Rule 4102]
2. Oxygen content of the effluent in the sulfide oxidation tank shall be maintained at a level sufficient to prevent nuisance odors. [District Rule 4102]
3. Emission rates from the flare shall not exceed any of the following limits: NO_x (as NO₂) - 0.06 lb/MMBtu; VOC (as methane) - 0.002 lb/MMBtu; CO - 0.3 lb/MMBtu; or PM₁₀ - 0.008 lb/MMBtu. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
4. The H₂S scrubber shall be in operation whenever biogas is produced in the anaerobic reactors. [District Rule 2201] Federally Enforceable Through Title V Permit
5. H₂S content of the scrubbed biogas shall not exceed 50 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Biogas flow rate to the flare shall not exceed 481,900 scf per day. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
7. Biogas production shall not exceed any of the following: 1st quarter - 31,670,000 scf, 2nd quarter - 31,800,300 scf, 3rd quarter - 83,115,800 scf, 4th quarter 83,115,800 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. A flame shall be present in the flare at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
9. The outlet shall be equipped with an automatic ignition system, or, shall be operated with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
10. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. The flame detection device shall be kept operational at all times except during flare maintenance when the flare is isolated from gas flow. During essential planned power outages when the flare is operating, the pilot monitor is allowed to be non-functional if the flare flame is clearly visible to onsite operators. All pilot monitor downtime shall be reported annually pursuant to Rule 4311, Section 6.2.3.6. [District Rule 4311] Federally Enforceable Through Title V Permit
11. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), pursuant to Section 6.5, and all commitments listed in that plan have been met. This standard does not apply if the APCO determines that the flaring is caused by an emergency as defined by Section 3.7 and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere. [District Rule 4311] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The operator shall monitor and record the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. [District Rule 4311] Federally Enforceable Through Title V Permit
13. Source testing to measure NOx and VOC emissions from the flare shall be conducted at least once every twelve (12) months. [District Rule 4311] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The following test methods shall be used: VOC - EPA Method 25, except when the outlet concentration must be below 50 ppm to meet the standard, in which case Method 25a may be used; exempt compounds - EPA Method 18 or ARB Method 422; NOx (lb/MMBtu) - EPA Method 19; NOx and O2 (concentrations) - EPA Method 3A, EPA Method 7E, or ARB 100. [District Rule 4311] Federally Enforceable Through Title V Permit
16. The results of each source test shall be submitted to the District within 45 days thereafter. [District Rules 1081 and 4311] Federally Enforceable Through Title V Permit
17. H2S content of the exhaust from the biological reactor serving the scrubber shall not exceed 1 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Residual dissolved oxygen level in the sulfide oxidation tank shall not fall below 1 milligram per liter. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
19. Permittee shall monitor the H2S content of the biogas at the inlet and at the outlet of the scrubber on a weekly basis. If the outlet H2S concentration does not exceed 50 ppmv for four consecutive weeks, monitoring may be conducted on a monthly basis. If the H2S concentration at the outlet exceeds 50 ppmv, weekly monitoring shall resume. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Permittee shall monitor the residual dissolved oxygen content of the sulfide oxidation tank at least on a weekly basis. If the residual dissolved oxygen content does not fall below 1 mg/liter for four consecutive weeks, monitoring may be conducted on a monthly basis. If the concentration falls below 1 mg/liter, weekly monitoring shall resume. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. The residual dissolved oxygen content sensor for the sulfide oxidation tank shall be calibrated in accordance with the manufacturer's specifications. A copy of the user's manual or like document from the manufacturer shall be maintained onsite so that the District may verify calibration frequency and procedures. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
22. If the residual dissolved oxygen content in the sulfide oxidation tank falls below 1 mg/liter, the permittee shall immediately correct the system. If concentration falls below 1 mg/liter for more than 10 consecutive minutes, the permittee shall notify the District within the following 1 hour. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
23. The operator shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311] Federally Enforceable Through Title V Permit
24. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: the results of an investigation to determine the primary cause and contributing factors of the flaring event; any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; if appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and the date, time, and duration of the flaring event. [District Rule 4311] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. The operator of a flare subject to flare monitoring requirements pursuant to Section 5.10 shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: the total volumetric flow of vent gas in standard cubic feet for each day; if the flow monitor used pursuant to Section 5.10 measures molecular weight, the average molecular weight for each hour of each month; a flow verification report which shall include flow verification testing pursuant to Section 6.3.5. [District Rule 4311] Federally Enforceable Through Title V Permit
26. For purposes of the flow verification report required by Section 6.2.3.8, vent gas flow shall be determined using one or more of the following methods, or by any alternative method approved by the APCO, ARB, and EPA: EPA Methods 1 and 2; a verification method recommended by the manufacturer of the flow monitoring equipment installed pursuant to Section 5.10; tracer gas dilution or velocity; other flow monitors or process monitors that can provide comparison data on a vent stream that is being directed past the ultrasonic flow meter. [District Rule 4311] Federally Enforceable Through Title V Permit
27. Every five years after the initial FMP submittal, the operator shall submit an updated FMP for each flare to the APCO for approval. The current FMP shall remain in effect until the updated FMP is approved by the APCO. If the operator fails to submit an updated FMP as required by this section, the existing FMP shall no longer be considered an approved plan. [District Rule 4311] Federally Enforceable Through Title V Permit
28. An updated FMP shall be submitted by the operator pursuant to Section 6.5 addressing new or modified equipment, prior to installing the equipment. Updated FMP submittals are only required if: (1) The equipment change would require an authority to construct (ATC) and would impact the emissions from the flare, and (2) The ATC is deemed complete after June 18, 2009, and (3) The modification is not solely the removal or decommissioning of equipment that is listed in the FMP, and has no associated increase in flare emissions. [District Rule 4311] Federally Enforceable Through Title V Permit
29. Permittee shall maintain the following records: a copy of the source testing result conducted pursuant to Section 6.4.2; a copy of the approved flare minimization plan pursuant to Section 6.5; a copy of annual reports submitted to the APCO pursuant to Section 6.2. [District Rule 4311] Federally Enforceable Through Title V Permit
30. Permittee shall maintain a log of the residual dissolved oxygen content sensor calibrations, which shall include the date and time of each calibration and any corrective actions. The records shall be retained, maintained on-site for at least five years, and made available for District inspection upon request. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of: (1) daily biogas production, (2) measured H₂S concentration in biogas, (3) date H₂S measurements taken from exhaust of biological reactor serving the scrubber, (4) measured concentration level of residual dissolved oxygen content taken from sulfide oxidation tank, and (5) date measurement of concentration level of residual dissolved oxygen content taken from sulfide oxidation tank. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
32. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authority to Construct
C-447-226-11



AUTHORITY TO CONSTRUCT

PERMIT NO: C-447-226-11

ISSUANCE DATE: 07/03/2014

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS:

5610 E OLIVE AVE
FRESNO, CA 93727

LOCATION:

5610 E OLIVE AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF 175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2, -3, OR -295, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK: ALLOW BIOGAS TO BE SENT TO THE BOILER LISTED IN PERMIT C-447-329

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) permit C-447-226-10 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
3. The primary chamber of the anaerobic reactor shall be enclosed and vented to the biofilter listed on C-447-225. [District Rule 4102]
4. Oxygen content of the effluent in the sulfide oxidation tank shall be maintained at a level sufficient to prevent nuisance odors. [District Rule 4102]
5. Emission rates from the flare shall not exceed any of the following limits: NO_x (as NO₂) - 0.06 lb/MMBtu; VOC (as methane) - 0.002 lb/MMBtu; CO - 0.3 lb/MMBtu; or PM₁₀ - 0.008 lb/MMBtu. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
6. The H₂S scrubber shall be in operation whenever biogas is produced in the anaerobic reactors. [District Rule 2201] Federally Enforceable Through Title V Permit
7. H₂S content of the scrubbed biogas shall not exceed 50 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services
C-447-226-11 - Jul 3 2014 10:31AM - TOMB : Joint Inspection NOT Required

8. Biogas flow rate to the flare shall not exceed 481,900 scf per day. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
9. Biogas production shall not exceed any of the following: 1st quarter - 31,670,000 scf, 2nd quarter - 31,800,300 scf, 3rd quarter - 83,115,800 scf, 4th quarter 83,115,800 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. A flame shall be present in the flare at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
11. The outlet shall be equipped with an automatic ignition system, or, shall be operated with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
12. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. The flame detection device shall be kept operational at all times except during flare maintenance when the flare is isolated from gas flow. During essential planned power outages when the flare is operating, the pilot monitor is allowed to be non-functional if the flare flame is clearly visible to onsite operators. All pilot monitor downtime shall be reported annually pursuant to Rule 4311, Section 6.2.3.6. [District Rule 4311]
13. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), pursuant to Section 6.5, and all commitments listed in that plan have been met. This standard does not apply if the APCO determines that the flaring is caused by an emergency as defined by Section 3.7 and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere. [District Rule 4311]
14. The operator shall monitor and record the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. [District Rule 4311]
15. Source testing to measure NO_x and VOC emissions from the flare shall be conducted at least once every twelve (12) months. [District Rule 4311] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. The following test methods shall be used: VOC - EPA Method 25, except when the outlet concentration must be below 50 ppm to meet the standard, in which case Method 25a may be used; exempt compounds - EPA Method 18 or ARB Method 422; NO_x (lb/MMBtu) - EPA Method 19; NO_x and O₂ (concentrations) - EPA Method 3A, EPA Method 7E, or ARB 100. [District Rule 4311] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 45 days thereafter. [District Rules 1081 and 4311]
19. H₂S content of the exhaust from the biological reactor serving the scrubber shall not exceed 1 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Residual dissolved oxygen level in the sulfide oxidation tank shall not fall below 1 milligram per liter. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Permittee shall monitor the H₂S content of the biogas at the inlet and at the outlet of the scrubber on a weekly basis. If the outlet H₂S concentration does not exceed 50 ppmv for four consecutive weeks, monitoring may be conducted on a monthly basis. If the H₂S concentration at the outlet exceeds 50 ppmv, weekly monitoring shall resume. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Permittee shall monitor the residual dissolved oxygen content of the sulfide oxidation tank at least on a weekly basis. If the residual dissolved oxygen content does not fall below 1 mg/liter for four consecutive weeks, monitoring may be conducted on a monthly basis. If the concentration falls below 1 mg/liter, weekly monitoring shall resume. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

23. The residual dissolved oxygen content sensor for the sulfide oxidation tank shall be calibrated in accordance with the manufacturer's specifications. A copy of the user's manual or like document from the manufacturer shall be maintained onsite so that the District may verify calibration frequency and procedures. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
24. If the residual dissolved oxygen content in the sulfide oxidation tank falls below 1 mg/liter, the permittee shall immediately correct the system. If concentration falls below 1 mg/liter for more than 10 consecutive minutes, the permittee shall notify the District within the following 1 hour. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
25. The operator shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever ever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311] Federally Enforceable Through Title V Permit
26. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: the results of an investigation to determine the primary cause and contributing factors of the flaring event; any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; if appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and the date, time, and duration of the flaring event. [District Rule 4311]
27. The operator of a flare subject to flare monitoring requirements pursuant to Section 5.10 shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: the total volumetric flow of vent gas in standard cubic feet for each day; if the flow monitor used pursuant to Section 5.10 measures molecular weight, the average molecular weight for each hour of each month; a flow verification report which shall include flow verification testing pursuant to Section 6.3.5. [District Rule 4311]
28. For purposes of the flow verification report required by Section 6.2.3.8, vent gas flow shall be determined using one or more of the following methods, or by any alternative method approved by the APCO, ARB, and EPA: EPA Methods 1 and 2; a verification method recommended by the manufacturer of the flow monitoring equipment installed pursuant to Section 5.10; tracer gas dilution or velocity; other flow monitors or process monitors that can provide comparison data on a vent stream that is being directed past the ultrasonic flow meter. [District Rule 4311]
29. Every five years after the initial FMP submittal, the operator shall submit an updated FMP for each flare to the APCO for approval. The current FMP shall remain in effect until the updated FMP is approved by the APCO. If the operator fails to submit an updated FMP as required by this section, the existing FMP shall no longer be considered an approved plan. [District Rule 4311]
30. An updated FMP shall be submitted by the operator pursuant to Section 6.5 addressing new or modified equipment, prior to installing the equipment. Updated FMP submittals are only required if: (1) The equipment change would require an authority to construct (ATC) and would impact the emissions from the flare, and (2) The ATC is deemed complete after June 18, 2009, and (3) The modification is not solely the removal or decommissioning of equipment that is listed in the FMP, and has no associated increase in flare emissions. [District Rule 4311]
31. Permittee shall maintain the following records: a copy of the source testing result conducted pursuant to Section 6.4.2; a copy of the approved flare minimization plan pursuant to Section 6.5; a copy of annual reports submitted to the APCO pursuant to Section 6.2. [District Rule 4311]
32. Permittee shall maintain a log of the residual dissolved oxygen content sensor calibrations, which shall include the date and time of each calibration and any corrective actions. The records shall be retained, maintained on-site for at least five years, and made available for District inspection upon request. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

33. Permittee shall maintain records of: (1) daily biogas production, (2) measured H₂S concentration in biogas, (3) date H₂S measurements taken from exhaust of biological reactor serving the scrubber, (4) measured concentration level of residual dissolved oxygen content taken from sulfide oxidation tank, and (5) date measurement of concentration level of residual dissolved oxygen content taken from sulfide oxidation tank. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit

ATTACHMENT C

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org



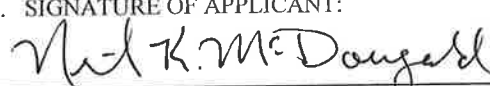
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JUL 31 2014

Permit Application For:

- | | | | |
|--------------------------|------------------------------|--|---|
| <input type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - New Emission Unit | Permits Services
SJVAPCD |
| <input type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - Modification Of Emission Unit With Valid Permit | |
| <input type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - Renewal of Valid Authority to Construct | |
| <input type="checkbox"/> | PERMIT TO OPERATE (PTO) | - Existing Emission Unit Now Requiring a Permit to Operate | |
- Minor Modification Permit Application

1. PERMIT TO BE ISSUED TO: E&J Gallo Winery-Fresno	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>5610 E. Olive Avenue</u> CITY: <u>Fresno</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93727</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>same as above</u> CITY: _____ _____/4 SECTION _____ TOWNSHIP _____ RANGE _____	WITHIN 1,000 FT OF A SCHOOL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO S.I.C. CODE(S) OF FACILITY : (If known):
4. GENERAL NATURE OF BUSINESS: Production of wine, brandy and concentrates	INSTALL DATE: Emission unit installed. Implement permit C-447-226-11, routing biogas to boiler C-447-329 (Victory Boiler; replacement of Boiler #3)
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC (If yes, please complete and attach a Compliance Certification form (TVFORM-009) NA <input type="checkbox"/> YES <input type="checkbox"/> NO	
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>FRW Winery -Implement C-447-226-11 Route Biogas from Anaerobic Reactor to C-447-329 (Victory Boiler; replacement of Boiler #3)</u> Attached please find the following documents that comprise the minor modification permit application to implement C-447-226-11, routing biogas to boiler c-447-329 (Victory Boiler; replacement of Boiler #3): <ul style="list-style-type: none"> • Completed Compliance Certification (TV-9) The minor modification amendment permit application is submitted prior to the District pre-startup inspection. It is Gallo's understanding there is a small fee associated with the minor modification permit application. Please provide detailed information to Mr. Jaime Horio so that Gallo can pay the required fee using the District's on-line payment system. Thank you.	
7. PERMIT REVIEW PERIOD: Do you request a three- or ten-day period to review the draft Authority to Construct permit? Please note that checking "YES" will delay issuance of your final permit by a corresponding number of working days. See instructions for more information on this review process. <input type="checkbox"/> 3-day review <input checked="" type="checkbox"/> 10-day review <input type="checkbox"/> No review requested 	

<p>8. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If yes, ATC/PTO #: <u>N-1237</u></p> <p>9. IS THIS APPLICATION FOR THE CONSTRUCTION OF A NEW FACILITY? (If "Yes" is checked, please complete the CEQA Information form) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>10. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If yes, NOV/NTC #: _____</p>	<p>Optional Section</p> <p>11. DO YOU WANT TO PARTICIPATE IN EITHER OF THE FOLLOWING VOLUNTARY PROGRAMS:</p> <p>"HEALTHY AIR LIVING (HAL)" <input type="checkbox"/> Yes, please send info</p> <p>"INSPECT" <input type="checkbox"/> Yes, please send info</p>	 
<p>12. TYPE OR PRINT NAME OF APPLICANT: Mr. Neil McDougald</p>	<p>TITLE OF APPLICANT: Plant Manager-Fresno Winery</p>	
<p>13. SIGNATURE OF APPLICANT: </p>	<p>DATE: 07/28/14</p> <p>PHONE #: (559) 458-2584 FAX #: E-MAIL: Neil.McDougald@ejgallo.com</p>	

FOR APCD USE ONLY:

<p>DATE STAMP:</p>	<p>FILING FEE RECEIVED: \$ _____ CHECK #: _____</p> <p>DATE PAID: _____</p> <p>PROJECT #: <u>C-1142329</u> FACILITY ID: <u>C-447</u></p>
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**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ Federal Major Permit MODIFICATION ☐ ADMINISTRATIVE
☒ MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: E&J Gallo Winery - Fresno	FACILITY ID C-447
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: E&J Gallo Winery-Fresno	
3. Agent to the Owner: Mr. Neil McDougald	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial **all** circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Neil K. McDougald
Signature of Responsible Official

07/28/2014

Date

Mr. Neil McDougald

Name of Responsible Official (please print)

Plant Manager – Fresno Winery

Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit
C-447-226-10

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-447-226-10

EXPIRATION DATE: 06/30/2016

EQUIPMENT DESCRIPTION:

175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2, -3, OR -295, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK

PERMIT UNIT REQUIREMENTS

1. The primary chamber of the anaerobic reactor shall be enclosed and vented to the biofilter listed on C-447-225. [District Rule 4102]
2. Oxygen content of the effluent in the sulfide oxidation tank shall be maintained at a level sufficient to prevent nuisance odors. [District Rule 4102]
3. Emission rates from the flare shall not exceed any of the following limits: NO_x (as NO₂) - 0.06 lb/MMBtu; VOC (as methane) - 0.002 lb/MMBtu; CO - 0.3 lb/MMBtu; or PM₁₀ - 0.008 lb/MMBtu. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
4. The H₂S scrubber shall be in operation whenever biogas is produced in the anaerobic reactors. [District Rule 2201] Federally Enforceable Through Title V Permit
5. H₂S content of the scrubbed biogas shall not exceed 50 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Biogas flow rate to the flare shall not exceed 481,900 scf per day. [District Rule 2201 and 4311, 5.10] Federally Enforceable Through Title V Permit
7. Biogas production shall not exceed any of the following: 1st quarter - 31,670,000 scf, 2nd quarter - 31,800,300 scf, 3rd quarter - 83,115,800 scf, 4th quarter 83,115,800 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All flaring shall be conducted in accordance with the facility's approved flare minimization plan (FMP). [District Rule 4311] Federally Enforceable Through Title V Permit
9. A flame shall be present in the flare at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
10. The outlet shall be equipped with an automatic ignition system, or, shall be operated with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
11. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
12. Source testing to measure NO_x and VOC emissions from the flare shall be conducted at least once every twelve (12) months. [District Rule 4311] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The following test methods shall be used: VOC - EPA Method 25, except when the outlet concentration must be below 50 ppm to meet the standard, in which case Method 25a may be used; exempt compounds - EPA Method 18 or ARB Method 422; NOx (lb/MMBtu) - EPA Method 19; NOx and O2 (concentrations) - EPA Method 3A, EPA Method 7E, or ARB 100. [District Rule 4311] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. H2S content of the exhaust from the biological reactor serving the scrubber shall not exceed 1 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Residual dissolved oxygen level in the sulfide oxidation tank shall not fall below 1 milligram per liter. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
18. Permittee shall monitor the H2S content of the biogas at the inlet and at the outlet of the scrubber on a weekly basis. If the outlet H2S concentration does not exceed 50 ppmv for four consecutive weeks, monitoring may be conducted on a monthly basis. If the H2S concentration at the outlet exceeds 50 ppmv, weekly monitoring shall resume. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall monitor the residual dissolved oxygen content of the sulfide oxidation tank at least on a weekly basis. If the residual dissolved oxygen content does not fall below 1 mg/liter for four consecutive weeks, monitoring may be conducted on a monthly basis. If the concentration falls below 1 mg/liter, weekly monitoring shall resume. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. The residual dissolved oxygen content sensor for the sulfide oxidation tank shall be calibrated in accordance with the manufacturer's specifications. A copy of the user's manual or like document from the manufacturer shall be maintained onsite so that the District may verify calibration frequency and procedures. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. If the residual dissolved oxygen content in the sulfide oxidation tank falls below 1 mg/liter, the permittee shall immediately correct the system. If concentration falls below 1 mg/liter for more than 10 consecutive minutes, the permittee shall notify the District within the following 1 hour. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
22. The operator shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311] Federally Enforceable Through Title V Permit
23. The permittee shall maintain the following records: copies of annual source testing results; and a copy of the approved flare minimization plan. [District Rule 4311] Federally Enforceable Through Title V Permit
24. Permittee shall maintain a log of the residual dissolved oxygen content sensor calibrations, which shall include the date and time of each calibration and any corrective actions. The records shall be retained, maintained on-site for at least five years, and made available for District inspection upon request. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of: (1) daily biogas production, (2) measured H2S concentration in biogas, (3) date H2S measurements taken from exhaust of biological reactor serving the scrubber, (4) measured concentration level of residual dissolved oxygen content taken from sulfide oxidation tank, and (5) date measurement of concentration level of residual dissolved oxygen content taken from sulfide oxidation tank. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.